IN THE UNITED STATES DISTRICT COURT IN AND FOR THE DISTRICT OF DELAWARE

JOHN DOHERTY, :

:

Plaintiff,

•

v. : C.A. No. 04-370-SLR

STATE OF DELAWARE,

DEPARTMENT OF CORRECTION, :

NOREEN RENARD, JOSEPH

PAESANI, JAMES LUPINETTI,
MICHAEL TIGUE, and ROBERT I.

GEORGE, JR.,

:

Defendants.

NOTICE OF DEPOSITION *

PLEASE TAKE NOTICE that defendants will take the stenographically recorded oral deposition of the plaintiff at the defendants' attorney's office on **June 21, 2005, commencing at 2:00 p.m.** and continuing thereafter until completed. *Pursuant to Rules 30(b)(5) and 34, plaintiff is requested to produce any documents that evince a financial loss in regards to his demotion that is the subject of the lawsuit.

/s/ Marc P. Niedzielski
Marc P. Niedzielski #2616
Deputy Attorney General
820 N.FrenchStreet, 6th floor
Wilmington, DE 19801
(302) 577-8324

Date: June 10, 2005

CERTIFICATE OF SERVICE

I certify that on June 10, 2005, I electronically served a copy of the attached Notice of Deposition on the following:

Richard R. Wier, Jr., Esquire Daniel W. Scialpi, Esquire 1220 Market Street, Suite 600 Wilmington, DE 19801 rwier@wierlaw.com

> /s/ Marc P. Niedzielski Marc P. Niedzielski (#2616) Deputy Attorney General